Comments on Tier2 Draft 2 for the Imaging Equipments

JBMIA Copier/MFDs Technical Sub-group

■TEC criteria for the copiers/printers (line 456 and 459)

We have received a comment that the criterion of low/middle speed (50 ipm or less) seems severe especially for the mono copiers/printers (TEC Table 1) in the four TEC criteria.

We would like you to investigate again whether using the coefficient ‘0.1’ in the formula, the folding point ‘40 ipm’, and the maximum TEC value ‘1.0kWh’ for the lowest product speed range are appropriate or not.

We also have received a comment that the setting of the value around 30 ipm for the color copiers/printers (TEC Table 2) seems severe. As in the above case, we hope that you review again whether using the coefficient ‘0.1’ and the folding point ’30 ipm’ are appropriate or not.

■Definition of High Performance IJ (line 193)

It is defined and set as a target of TEC based solely on the difference in marking technology from the conventional Ink Jet products. We do not oppose that it will be a TEC target, however, consider that a clear definition for the product speed is required because the IPM of the inkjet products varies drastically according to the coverage rate.

■Definition of Standby (line 265)

As noted in Draft, it is basically in accordance with IEC62301; this standard is designed for the household electrical appliances and does not sufficiently fit in to the imaging equipments, resulting in confusions. As you may know, the criteria of Energy Star qualified computers now being revised include no description on Standby, which will be equivalent to OFF mode. We consider that the criteria for the imaging equipments should be in accordance with those of computers.

As for facsimile etc. without a power switch, we consider that the definition of Standby should be equivalent to that of Sleep to delete the definition of Standby for a simplified definition enabling better understandings for it.

■Definition of DFE (line 308 and 412)

We consider that the definition of DFE should be more clarified in view of the structure, and request correction of the description into the following;
‘A DFE that draws its power (both AC and DC) from the imaging equipment product is defined as an Internal DFE. A DFE that has an independent power cord is defined as an External DFE.’
Based on the above definition, we agree with the definition of an External DFE with an independent cord. As for the internal DFE that draws its power from the equipment, we consider that drawing the power is deemed as a function of the equipment, and any exceptional clause should not be added for the purpose of preventing the standard from being more complicated.

■OM Table 1 and OM Table 8 (line 557 and 585)

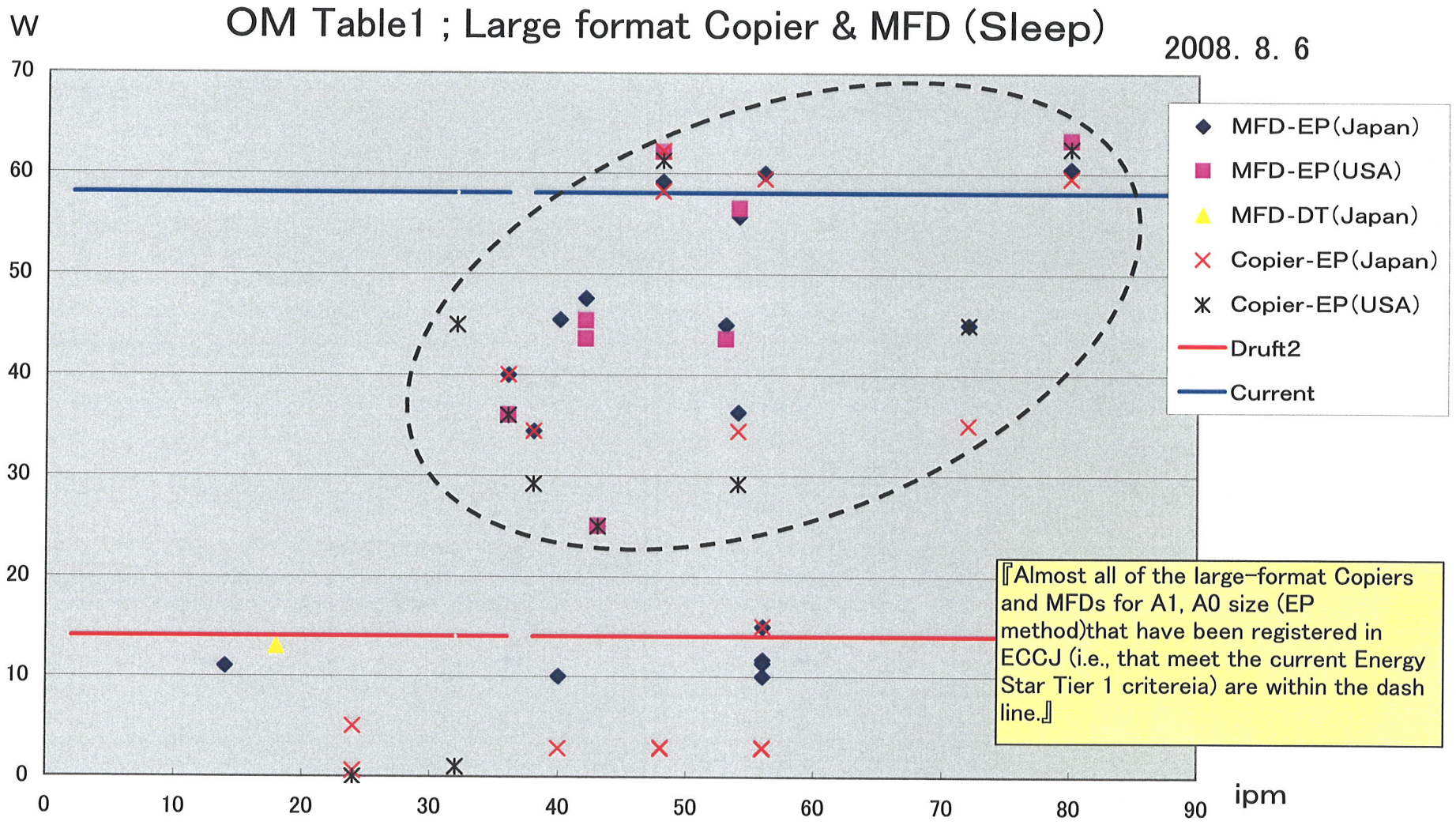
Especially the large-format products that accommodate up to A1, A0 size have a significant difficulty in achieving their criteria (nearly 0%), and the criteria in this Draft should be deemed as inappropriate. (Please see the attached graphs.)
We request that the current Tier 1 criteria be applied to the large-format products for A1, A0 sizes.

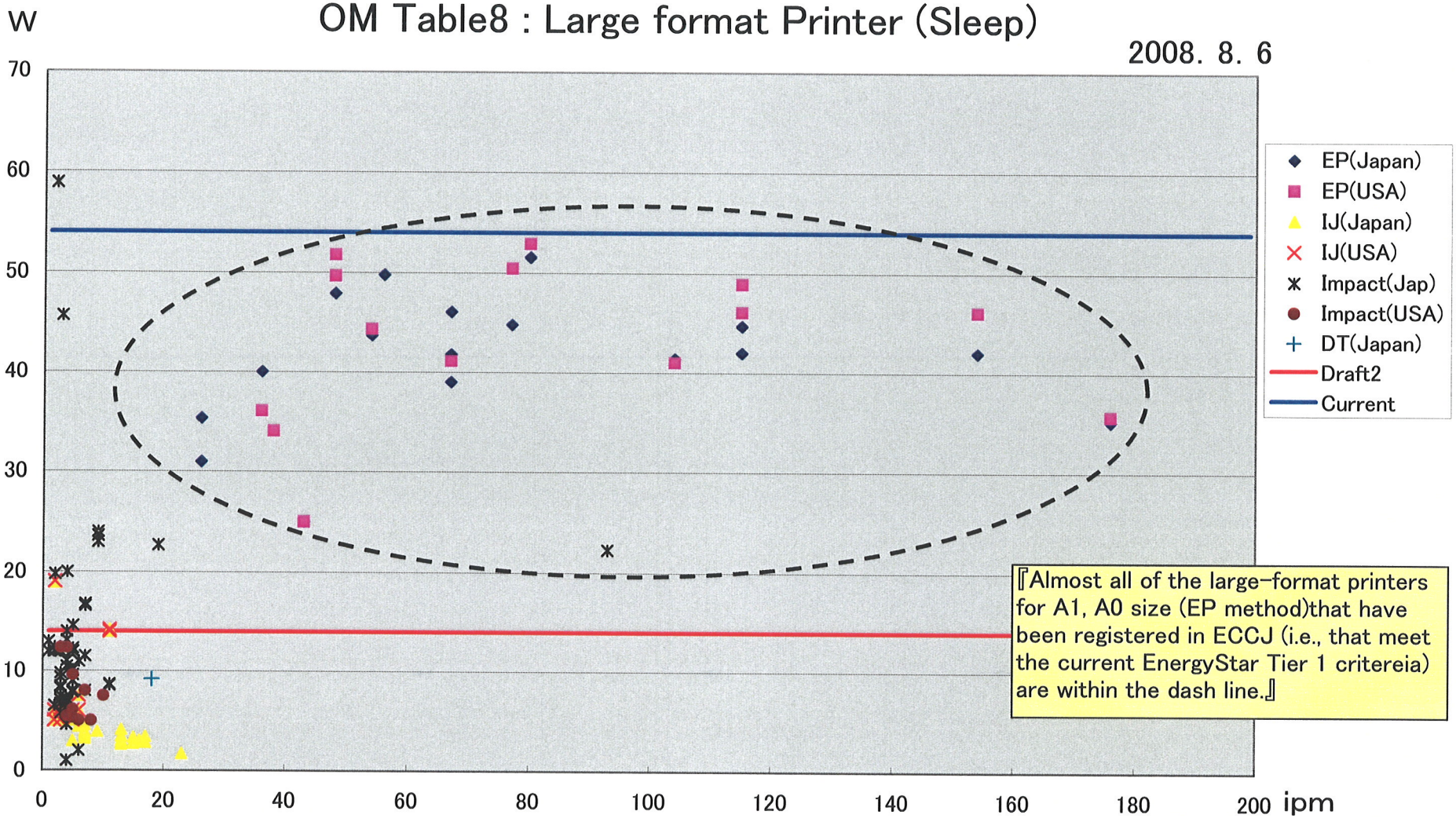
■IEEE1621 (line 717)

We fully recognize the importance of user interface for power control. However, our industry has made not a few negative comments on ‘crescent moon symbol’ in IEEE 1621. We consider that it should be in advance fully recognized as an ISO standard.
We therefore request that IEEE1621 be applied as a recommended condition, not a mandatory one.

■Others

Efficiency requirements for the power supply unit (PSU) applied in addition to the TEC and OM criteria for the imaging equipments would be double criteria and we consider its introduction to be undesirable.


OM Table1 ; Large format Copier & MFD (Sleep)
2008. 8. 6
W
70
60
50
40
30
20
10
0
0
10
20
30
40
50
60
70
80
90
ipm
MFD-EP(Japan)
MFD-EP(USA)
MFD-DT(Japan)
Copier-EP(Japan)
Copier-EP(USA)
Druft2
Current
『Almost all of the large-format Copiers and MFDs for A1, A0 size (EP method)that have been registered in ECCJ (i.e., that meet the current Energy Star Tier 1 critereia) are within the dash line.』


OM Table8 : Large format Printer (Sleep)
2008. 8. 6
W
70
60
50
40
30
20
10
0
0
20
40
60
80
100
120
140
160
180
200
ipm
EP(Japan)
EP(USA)
IJ(Japan)
IJ(USA)
Impact(Jap)
Impact(USA)
DT(Japan)
Draft2
Current
『Almost all of the large-format printers for A1, A0 size (EP method)that have been registered in ECCJ (i.e., that meet the current EnergyStar Tier 1 critereia) are within the dash line.』